

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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January 16, 2004

Bruce P. Beausejour, Esq.
Victor Del Vecchio, Esq.
Verizon Massachusetts
185 Franklin Street, 13th Floor
Boston, MA 02110

Re: D.T.E. 03-60 (Tracks A and B)
D.T.E.'s Second Set of Information Requests to Verizon New England, Inc.

Dear Messrs. Beausejour and Del Vecchio:

Enclosed please find the second set of questions to Verizon New England, Inc. issued by the Department of Telecommunications and Energy in the above-captioned matter. Please submit Verizon's response to the Department and the parties in hard copy and by email on or before 5:00 p.m., Tuesday, January 27, 2004. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

/s/

Paula Foley
Assistant General Counsel

Encls.

cc: D.T.E. 03-60 service list (w/encls.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon New England, Inc. d/b/a Verizon Massachusetts the following Information Requests.

Instructions

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; submit two (2) copies of the responses to Paula Foley, Hearing Officer; and one (1) copy of the responses to Jesse Reyes, Hearing Officer.

QUESTION TO VERIZON MASSACHUSETTS

D.T.E. 03-60 (Tracks A and B)

January 16, 2004

TRACK A

1. Please refer to the Initial Panel Testimony of Verizon Massachusetts, p. 12, at lines 9-11. Please explain the reference to “the admonition of the FCC.”
2. Please refer to the Supplemental Panel Testimony of Verizon Massachusetts, Attachment 1, Parts 1 and 2.
 - a. Please break down the “Verizon Count” further into “Line Count Study” and “Residential Listing in the E911 Database,” depending on the source of the data.
 - b. Are all the lines listed under “Residential Listing in the E911 Database” served using intermodal switching alternatives? If no, please describe and identify exceptions.

TRACK B

3. Refer to Hot Cut Panel Testimony, p. 56, lines 3-10. Please fully explain what information is contained within the Work Force Administration-Dispatch In (“WFA-DI”) system and how data is entered into it.
4. Refer to Hot Cut Panel Testimony, p. 56, lines 7-8. Please explain how Verizon determined the travel time as a proportion of total central office technician time.
5. Refer to Hot Cut Panel Testimony, p. 56, lines 16-17. For each average task time derived from the survey process, please provide the corresponding average time produced from the WFA-DI system.
6. Refer to Hot Cut Panel Testimony, p. 35, lines 18-19 (“The process would not apply to IDLC lines and to certain other loop types”). Please identify the “other loop types” that Verizon is referring to and explain why they cannot be included in the batch process. In addition, if these other loop types are excluded from the large job process, please explain why.
7. Refer to ATT-VZ 2-74 and 2-75. Please fully explain why a CLEC cannot have a loop on IDLC cutover to a loop on UDLC and still be included within the batch or large job

process. Are there any situations when an IDLC loop can be included in either of these processes, and if so, please fully explain under what conditions.

8. How did Verizon determine to whom to distribute its hot cut work activity surveys? What effort, if any, did Verizon make to ensure that its hot cut surveys were distributed to a sample representative of Verizon's actual work force?
9. Please refer to Verizon Supplemental Panel Testimony, p. 10 ("Verizon has rolled out the WPTS process on a much larger scale"). At present, in which states does Verizon offer the WPTS process, and at what rates?